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UNITED STATES DISTRICT COURT OF NEVADA

ROSELYN VILLAVICENCIO YOUNG, an
individual;

Plaintiff,

v.

GEICO CASUALTY COMPANY; DOES I-
XV, and ROE CORPORATIONS I - X,
inclusive,

Defendants.

CASE NO. 2:25-CV-00001-EJY

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH
LR 26-1(b)**

The parties submit their proposed discovery plan and scheduling order pursuant to LR 26-1.

Meeting: Pursuant to FRCP 26(f) and LR-26-1(a), a meeting was held on January 21, 2025, and was attended by Christopher L. Benner, Esq., counsel for Plaintiff, and Jonathan Carlson, counsel for Defendant.

1. Pre-Discovery Disclosures: Pursuant to FRCP Rule 26(a)(1), the parties will make their pre-discovery disclosures, including but not limited to any computation(s) of damages required pursuant to FRCP 26(a)(1)(A)(iii), by **Tuesday February 4, 2025**.

2. Areas of Discovery: Discovery should include, but not be limited to: all claims and defenses allowed pursuant to the Federal Rules of Civil Procedure.

3. Discovery Plan: Pursuant to LR 26-1(b)(1), the 180 days of discovery runs from the first time the first defendant answers or otherwise appears. Here, Defendant appeared

1 on January 2, 2025, by filing a Notice of Removal [ECF No. 1]. The discovery deadlines herein
2 have been calculated from that date.

3 4. **Discovery Cut-Off Dates:** The parties propose that discovery must be
4 commenced and completed no later than **Tuesday, July 1, 2025**, (180 days after the defendants
5 appeared), and be conducted as follows:

6 A. **Amending the Pleadings and Adding Parties:** The parties shall have until
7 Wednesday April 2, 2025, to file any motions to amend the pleadings to add parties, ninety (90)
8 days prior to the discovery cut-off date, pursuant to LR 26-1(b)(2).

9 B. **FRCP 26(a)(2) Disclosures of Experts:** Expert witness disclosures shall
10 be made on or before **Friday, May 2, 2025**, sixty (60) days prior to the discovery cut-off.
11 Disclosures regarding rebuttal experts shall be made on or before **Monday, June 2, 2025**¹,
12 thirty-one (31) days after the initial disclosures of experts. The requirements of FRCP
13 26(a)(2)(B) shall apply to any such disclosures.

14 C. **Dispositive Motions:** The parties shall have until **Thursday, July 31,**
15 **2025**, to file dispositive motions, thirty (30) days after the discovery cut-off. In the event
16 the discovery cut-off is extended, the deadlines for filing dispositive motions automatically
17 will be extended until thirty (30) days after the new discovery cut-off date.

18 D. **Pre-Trial Order:** The parties will prepare a consolidated pre-trial order on
19 or before **Tuesday, September 2, 2025**², which is thirty-three (33) days after the date set for
20 filing dispositive motions in the case. This deadline will be suspended if dispositive motions
21 are timely filed until thirty (30) days after the decision of the dispositive motions or until further
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25 ¹ The date occurring 30 days following the expert disclosure cut-off date falls on Sunday, June 1, 2025,
26 and as such, this deadline has been moved to the next judicial day.

27 ² The date occurring 30 days following the dispositive motion deadline falls on Saturday, August 30,
28 2025, and as such, this deadline has been moved to the next judicial day, following the Monday,
September 1, 2025, Labor Day holiday.

1 order of the court. The disclosure required FRCP Rule 26(a)(3) and objections thereto, shall be
2 made in the pre-trial order.

3 E. **Court Conferences:** If the court has questions regarding the dates
4 Proposed by the parties, the parties request a conference with the court before entry of the
5 scheduling order.

6 F. **Extensions or Modifications of the Discovery Plan and Scheduling Order:**
7 LR 26-3 governs modifications or extensions of this discovery plan and scheduling order. Any
8 stipulation or motion to extend a deadline set forth in the discovery plan and scheduling order
9 must be made not later than twenty-one (21) days before the subject deadline. Any stipulation or
10 motion to extend the discovery cut-off period must be made no later than **Tuesday, June 10,**
11 **2025**, twenty-one (21) days before the discovery cut-off date.

12 **5. Other Items:**

13 A. **Format of Discovery:** Pursuant to the electronic discovery amendments
14 to the Federal Rules of Civil Procedure effective December 1, 2006, the parties addressed the e-
15 discovery issues pertaining to the format of discovery at the Rule 26(f) conference. The parties do
16 not anticipate discovery of native files or metadata at this time, but each party reserves the right to
17 request such electronic data as discovery progresses. The parties discussed the potential discovery
18 of native files or metadata and inspection of devices used to store information electronically.
19 Each party reserves the right to request electronic data as discovery progresses.

20 B. **Alternative Dispute Resolution:** The parties hereby certify that they met
21 and conferred about the possibility of using alternative dispute-resolution processes including
22 mediation, arbitration, and if applicable, early neutral evaluation (collectively, **ADR**) and
23 determined that ADR is not a viable option at this time.

24 C. **Alternative Forms of Case Disposition:** The parties hereby certify
25 they considered Alternative Disposition means and do not consent to either at this time.
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1 **D. Electronic Evidence:** The parties intend to present evidence in electronic
2 format. No stipulations have yet been reached. Stipulations, if any, will be provided when the
3 Pretrial Order is filed.

4 DATED January 31, 2025

DATED January 31, 2025

5 GINA CORENA & ASSOCIATES

MCCORMICK, BARSTOW, ET AL.

6 /s/ Christopher Benner

/s/ Jonathan Carlson

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13 Attorneys for Plaintiff

Attorneys for Defendant Geico Casualty
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14 IT IS SO ORDERED.

15 
16 United States Magistrate Judge

17 Dated: January 31, 2025